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PART B Application Inspection Report

Name of Facility: Reid Supply Company
Location: Wichita, Kansas
EPA I.D. #: KSD007246846
Inspected By: Ms. Karen Flournoy (EPA); Mr. John P. Goetz and
Mr. John S. Ramsey (KDHE)
Date of Inspection: October 30, 1984
Contact(s): Mr. David Trombold
Time: 10:00 a.m.

BACKGROUND

On October 30, 1984, Ms. Karen Flournoy, Mr. John Paul Goetz and Mr. John S. Ramsey conducted an RCRA inspection of The Reid Supply Company's Hazardous Waste Facility. The inspection was conducted to meet the requirements of K.S.A. 65-3437(d) to determine if Reid Supply was in compliance with current Kansas statutes, K.S.A. 65-3430 et. seq. and Regulations K.A.R. 28-31-1 through 28-31-13.

INTERIM STATUS COMPLIANCE

Prior inspections were conducted at Reid Supply on April 6, July 6, and August 16, 1984. Numerous problems were identified during these inspections both in the Hazardous Waste Management Practices and in the Records and Record Keeping Practices at Reid Supply. Moreover, Reid Supply's Part B Hazardous Waste Permit Application was called in on September 27, 1982. We (KDHE) and EPA received the Part B Application on March 30, 1983. The application was reviewed and found to be incomplete. Additional information was requested from Reid on May 17, 1983 to complete the application. Additional, yet incomplete, information was submitted by Reid Supply. To the date of our October 30, 1984 inspection, we have continued to solicit additional information from Reid Supply to complete their Part B Application. The application was not complete as of our October 30, 1984 inspection. Hence, Reid Supply is not yet in compliance with interim status standards.

40 CFR PART 264 COMPLIANCE

Reid Supply Company has interim status for the following waste management operations.

1. Container storage area subject to 40 CFR 264 Subpart I.
27,500 Gallons (500-55 Gallon Drums)
2. Two above ground steel storage tanks subject to 40 CFR Subpart J.
9000 Gallons (2-4500 Gallon Vertical Tanks)



R00001561
RCRA Records Center

The inspection of each waste management operation for compliance with 40 CFR 264 standards is summarized below:

CONTAINER STORAGE AREA

264.171 Condition of Containers

An inspection of the barrels in the container storage area found none to be leaking. All containers were closed and in good physical condition. Some containers were not sealed closed. These would have to be sealed before transporting off-site.

264.172 Compatibility of Waste with Containers

The wastes stored at Reid Supply are hazardous because of their ignitability and toxicity. No special liners or barrels are used for these wastes. Wastes are considered compatible with 17 H Barrels.

264.173 Management of Containers

- a) All containers holding hazardous waste were closed at the time of inspection.
- b) Containers are not to be handled or stored in a manner which may rupture the containers or cause them to leak.

264.174 Inspections

A review of Reid's inspection logs for this area indicated that proper weekly inspections were being conducted.

264.175 Containment

Containers in the storage area are placed on pallets to protect them from contact with accumulated liquids. A perimeter dike has been constructed of bricks to contain any spilled liquids. The dike is not sufficient and a new dike must be constructed before Reid Supply will be in compliance with this requirement.

264.176 Special Requirements for Ignitable or Reactive Wastes.

Reid Supply has requested a Waiver from the minimum property line distance of this requirement. The Wichita Fire Department has approved the Waiver request.

264.177 Special Requirements for Incompatible Wastes.

Reid Supply runs a special test to determine if any wastes are incompatible or reactive with each other. Incompatible or reactive wastes are not stored in the same container and containers containing incompatible or reactive wastes are to be separated from one another in the storage area.

264.178 Closure

Reid Supply has provided a closure plan which removes all hazardous waste and hazardous waste residues from the container storage area.

TANK STORAGE

264.191 Design (Shell Thickness)

The outside of the storage tanks were visually inspected. No leaks were noted. Surface rust was noted on one tank. Minimum shell thickness tests have been conducted. The tanks are in compliance with this requirement. The EPA and KDHE may specify minimum shell thickness standards as a condition of the permit.

264.192 General Operating Requirements

Reid Supply does not store wastes which are incompatible with the container or tank materials of construction. Controls to prevent tank overfilling are provided. Reid Supply does not have any open top tanks.

264.197 Inspections

Reid Supply has established an inspection scheme for the tanks. A review of the inspection logs indicates Reid is in compliance with this requirement.

264.197 Closure

Reid Supply has provided a closure plan to remove all hazardous waste and hazardous waste residues from tanks, discharge control equipment and discharge confinement structures.

264.198 Special Requirements for Ignitable or Reactive Wastes.

The ignitable wastes are to be stored or treated in such a way that they are protected from any material or conditions which may cause the waste to ignite or react.

264.199 Special Requirements for Incompatible Wastes

A special test is run to ensure that incompatible wastes are not placed in the same tank.

Mr. Goetz and Ms. Flournoy noted that the condition of Reid Supply's facility was greatly improved since the last inspection. Ms. Flournoy offered her comments on the Part B Hazardous Waste Facility Permit Application. It was pointed out that, if a timely complete response to complete the Part B Permit Application was not received, a decision to deny the permit would be made.

CONCLUSIONS

1. A new dike must be constructed for the container storage area. The present one is not adequate.
2. Although the tanks passed the minimum shell thickness test, an interim inspection of the tanks should be conducted during the permit life. The internal inspection should be repeated every 5-6 years.
3. Reid Supply must respond, in a timely and complete manner, to the Part B Permit comments by Ms. Flournoy or their permit will be denied.

RECOMMENDATIONS

1. An inspection should be conducted to ensure construction of the new dike, for the container storage area, is completed according to an approved compliance schedule.
2. Reid should include periodic (5-6 years) internal inspection of the storage tanks as a part of their permit application.
3. An intermediate review of Reid Supply's responses to the Part B Permit completion comments should be offered to ensure that a complete and timely response is made.
4. Aisles should be clearly marked for areas where hazardous waste is to be stored with markings on the floor or signs on the walls.
5. KDHE should proceed with processing of the Part B Hazardous Waste Permit application, contingent on Reid Supply Company's completing the recommendations outlined above.